

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROBERT MOORE and FRANK R. FEREZA,  
JR., individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

CONSOL PENNSYLVANIA COAL  
COMPANY LLC,

Defendant.

CASE NO. 2:23-CV-1991

JURY TRIAL DEMANDED

**DEFENDANT’S MOTION FOR AN ORDER REQUIRING PLAINTIFFS’ COUNSEL  
TO CEASE AND DESIST FROM IMPROPER SOLICITATIONS**

Defendant CONSOL Pennsylvania Coal Company LLC (“CONSOL PA” or “Defendant”) hereby moves entry of an order: (1) against counsel for Plaintiffs Robert Moore and Frank R. Fereza, Jr. (“Plaintiffs”) at Nilges Draher LLC (“Plaintiffs’ counsel”) for their alleged improper solicitations; and (2) requiring them to immediately cease and desist from continued solicitations targeting current and/or former employees of CONSOL PA as well as current and/or former employees of companies affiliated with CONSOL PA. Per the Court’s Practices and Procedures Rule II(A), Defendant affirmatively states that this motion has not been discussed with Plaintiffs.

**Dated: January 8, 2024**

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*Pro Hac Vice Motion Forthcoming*

*Attorneys for Defendant CONSOL  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 8, 2024 a copy of the foregoing was filed and served through the Court's ECF system. All parties may access a copy of this document through the Court's system.

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By: /s/ Gerald L. Maatman, Jr.  
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